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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

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UNITED STATES OF AMERICA,	Case No. 1:14CR268
Plaintiff,	
) JUDGE PATRICIA GAUGHN
VS.)) MOTION FOR EARLY TERMINATION) OF SUPERVISED RELEASE
JACQUELINE K. MIDDLETON,	
Defendant.	,

Now comes the defendant herein and moves this court to allow early termination of the supervised release in the above captioned case. This motion is based on Section 3583 of Title 18 of the United States Code, and the following memorandum of points and authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

Ms. Middleton has successfully completed her term of incarceration, helping the lives of handicapped inmates housed under the auspices of Federal Bureau of Prisons. Thus far she has completed (13) thirteen months of her supervised release period, this would normally expire on September 30, 2018. Based on her successful performance on supervised release, Ms. Middleton hereby moves the Court for entry of an order terminating her supervised release. The U.S. Probation Officer is in support of this request. See further the Affidavit of Defendant attached as Exhibit A

ARGUEMENT OF LAW

Under 18 U.S.C. Section 3583(e), the Court has the authority to grant early termination of a previously imposed term of supervised release.

Section 3583(e)(1) provides:

(e) Modification of conditions or revocation. The court may, after considering the factors set forth in section 3553(a) (1), (a) (2) (B), (a) (2) (C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7) (1) terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice.

18 U.S.C. § 3583(e)(1); see also Fed. R. Crim. Procedure 32.1(c)(1), (2)(B) & (C) (providing for hearings for modifications of supervised release, unless the result is favorable to the person supervised and the government does not object after notice)

As of the filing of this motion, she will have successfully completed thirteen months of her term of 24 months of supervised release.

Ms. Middleton has risen to the challenges of severe health issues and succeeded in being a good volunteer and a good steward in her communities. Indeed

Ms. Middleton has made great strides toward improving herself and making a better life for herself, her family and the United States of America.

Ms. Middleton has paid her special assessment and fulfilled the directives of this court to the best of her ability, and has been in compliance with all her terms and conditions of supervision. She also recognizes the value of hard work and is proud to have volunteer opportunities because Ms. Middleton enjoys her support to her family and takes great pride in what she is doing on a daily basis; this gives her a sense of purpose

that will keep her succeeding in supporting her family, community and church.

CONCLUSION

Ms. Middleton realizes that "there is a better life, a Christian and family life," which she can and will continue to live. Ms. Middleton's exemplary performance on supervise release warrants a reduction in her term of supervised release. Accordingly, she respectfully moves this Court under Section 3583(e) (1) of Title 18 for early termination of her term of supervised release.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on December 15,2017 a copy of the foregoing Motion For Early Termination Of Supervised Release was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Fred Middleton
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